The attached simulation also employs a Monod biodegradation modeling approach that allows for consideration of the growth and activity of the microbial population responsible for degradation of the COCs, whereas the model presented in the Addendum II Workplan did not account for the expected changes in microbial populations, and the effect on COC degradation of these microbial population changes. The same estimates of remaining LNAPL and COC mass previously provided by the AF were used for both EPA/ADEQ modeling exercises, but note that EPA/ADEQ have significant concerns about how accurately those mass estimates reflect current conditions at the Site.

Even small changes in these values and parameters can markedly affect the estimates of Site remedial timeframes. With that caveat, the EPA and ADEQ technical team have concluded that realistic remedial timeframes for enhanced bioremediation to degrade contaminants remaining at the ST-12 Fuel Spill site range from 100 to 200 years for the Upper Water Bearing Zone and 30 to 50 years for the Lower Saturated Zone.

Please incorporate these updated modeling results into the next version of the Addendum II EBR workplan. We look forward to continued discussion to determine the most appropriate path forward to address current site conditions.

Sincerely,

Carolyn d'Almeida
Remedial Project Manager, EPA

Wayne Miller
Remedial Project Manager, ADEQ

cc: Ardis Dickey, AFCEC

Attachments